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Docket Management Facility  
US Dept. of Transportation  
400 Seventh Street SW  
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Washington, DC 20590-001

SUBJECT: DOT DMS

Docket Number FRA-1999-6689 - 93  
Reflectorization of Rail Freight  
Rolling Stock

To Whom This May Concern:

In response to the proposed rule making in the subject Docket, I offer the following comments and observations:

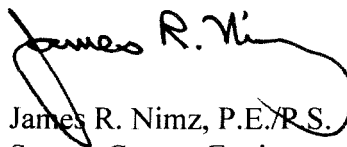
1. Seneca County, Ohio is a rural county with a population of about 58700. We have approximately 100 miles of track running through our county servicing CSX, NS and a local rail port authority. There are 135 total public rail crossings with 86 being located in rural areas (many are hump crossings) and 39 passive crossings (no lights and/or gates). The passive crossings all have the "Buckeye Cross Buck". The daily train traffic ranges from 19-86 depending on the rail line with train speeds up to 70 MPH. Our county generally ranks within the top 5 in the state in regard to the number of train accidents. It is not uncommon to have blocked crossings as trains approach the switching areas of Fostoria, Bellevue and Willard. Also our work force trends towards the manufacturing area which maintain 24/7 operations. Based upon the above facts, it should be clearly evident that we as a community are clearly aware of the issues discussed in this Docket.
2. The time frame to complete the conspicuity requirements should be accelerated from 10 years to 5 years based upon the fact that 23% of 4000 accidents involve running into trains occupying a grade crossing with 80% of these occurring at night. The Docket clearly indicates this issue has been studied for many years thereby concluding this has been an ongoing problem identified by FRA and the railroad companies. It is now time to act to correct this ongoing problem.
3. The proposed rules require markings on all new rolling stock at times of construction which makes common sense. However, the rules go on to state that

existing stock needs to be brought up to standard when the cars are repainted, rebuilt, under periodic maintenance, or have an air brake test. Besides the proposed rules, I believe a minimum requirement of 1/10 or 1/5 (based on program years) of the annual rolling stock must be upgraded to meet the conspicuity requirements.

4. There is no provision to have rail cars grouped on the train by those that comply and those that do not. My concern deals with the situation where an unmarked car is located between two marked cars that happen to stop at the crossing. This configuration may appear as a break in the train at night and lead to confusion to the motorist.
5. Based upon retroreflectivity readings white will always appear the brightest of all color groups. Therefore, to maximize the effect of these markings, I believe the color should be white versus the proposed yellow. Over time the white color should hold up better and reflect better under the "harsh railroad environment".
6. The proposed rules allow locomotives and cars that have existing markings to maintain a minimum area of one square foot. As proposed, all upgraded markings must be approximately four square feet per side. Therefore, I believe at a minimum, three square feet of new markings should be added per side to the cars/locomotives currently marked to at least bring them up to standard.
7. Minimum retroreflectivity standards should be established similar to those for road signs and highway markings. Without minimum standards how does one establish a procedure to maintain, upgrade or replace the markings?
8. Section 224.109 allows "if conditions at the time of inspection are such that replacement material can not be applied (winter months), such application may be completed not later than the earliest of the following events: when the car next receives a required single car air brake test (5-8 years) or when the car is taken out of service for repairs or other maintenance". Too much time is allowed to come into compliance and maybe a better approach is to set a minimum time frame of 6 or 12 months after the initial inspection.

Do not hesitate to contact me should you have any questions. Thank you for allowing us to offer comments and concerns regarding this important issue.

Very truly yours,

  
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Seneca County Engineer

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cc: Seneca Regional Planning Commission